

1 JOHN L. BURRIS, Esq., SBN 69888
2 BENJAMIN NISENBAUM, Esq., SBN 222173
3 THE LAW OFFICES OF JOHN L. BURRIS
4 Airport Corporate Center
5 7677 Oakport Street, Suite 1120
6 Oakland, California 94621
7 Telephone: (510) 839-5200
8 Facsimile: (510) 839-3882
9 John.Burris@johnburrislaw.com

10 Attorneys for Plaintiffs

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

LEILANI JIMENEZ, individually, and as
successor-in-interest for Decedent DENNIS
JIMENEZ; J.J., a minor, by and through his
guardian ad litem Leilani Jimenez; D.J., a
minor, by and through her guardian ad litem
Leilani Jimenez, and DENNIS JIMENEZ, Jr.
an individual,

Plaintiffs,

v.

COUNTY OF ALAMEDA, a municipal
corporation and DOES 1-50, individually,
inclusive;

Defendants.

Case No.: C 13-04620 CRB

**STIPULATION AND ORDER TO
CONTINUE FURTHER CASE
MANAGEMENT CONFERENCE AND
HEARING ON DEFENDANTS'
MOTION FOR PARTIAL SUMMARY
JUDGMENT**

STIPULATION

WHEREAS, Defendants in the above-entitled action filed a Motion for
Partial Summary Judgment in this action to be heard by the Court on August 14,
2015 at 10:00 a.m.

1 WHEREAS, the Court continued on its own motion to August 14, 2015
2 at 10:00 a.m. a Further Case Management Conference in this matter which had
3 been scheduled to be held on July 20, 2015.

4 WHEREAS, Plaintiffs' lead counsel in this action, Ben Nisenbaum, has
5 a longstanding scheduled family vacation to Mexico from August 12-August 19,
6 2015 with counsel's in-laws.

7 WHEREAS, Plaintiffs' lead counsel, Ben Nisenbaum, is the best
8 equipped and prepared lawyer in this case in Plaintiffs' counsel's office to
9 argue against Defendants' Partial Motion for Summary Judgment.

10 WHEREFORE, The parties stipulate that the Case Management
11 Conference and hearing on Defendants' Partial Motion for Summary Judgment
12 be continued by two weeks to August 28, 2015 at 10:00, when counsel for all
13 parties are mutually available.

14 IT IS SO STIPULATED.

15 **LAW OFFICES OF JOHN L. BURRIS**

16 Dated: August 3, 2015

17 By: /s/Benjamin Nisenbaum
18 Ben Nisenbaum
Attorney for Plaintiffs

19 Dated: July 22, 2015

BOORNAZIAN, JENSEN & GARTHE

20 By: /s/Gregory J. Rockwell
21 Gregory J. Rockwell, Esq.
22 Attorneys for Defendants
23
24
25
26
27
28

ORDER

PURSUANT TO THE FOREGOING STIPULATION, good cause shown, the Further Case Management Conference and hearing on Defendant Motion for Partial Summary Judgment is continued to September 18, 2015 at 10:00 a.m.

IT IS SO ORDERED.

Dated: August 3, 2015



Honorable Charles R. Breyer
UNITED STATES DISTRICT JUDGE